

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

UNITED STATES OF AMERICA

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CRIMINAL NO. 6:13-cr-00321

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18 U.S.C. § 666 (a)(1)(B)

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18 U.S.C. § 1343

18 U.S.C. § 1346

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18 U.S.C. § 1349

VERSUS

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18 U.S.C. § 981(a)(1)(C)

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28 U.S.C. § 2461(c)

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JUDGE FOOTE

WALTER O. GUILLORY

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MAGISTRATE JUDGE HANNA

BILL OF INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1

**Receipt of a Bribe by Agent of an
Organization Receiving Federal Funds
[18 U.S.C. § 666(a)(1)(B)]**

A. INTRODUCTION

At all times material herein:

1. The Lafayette Housing Authority (LHA) and the Opelousas Housing Authority (OHA) were public corporations designed to provide safe and sanitary dwelling conditions.

2. The LHA and the OHA received funds from the United States Department of Housing and Urban Development. The LHA and the OHA received in excess of \$10,000 of federal funds per year from 2006 through 2010.

3. The defendant, **WALTER O. GUILLORY**, was employed as the Executive Director of the LHA from June 1998 through October 2010. The defendant, **WALTER O. GUILLORY**, was also the Executive Director of the Opelousas Housing Authority from November 2005 through November 2010.

4. As the Executive Director for LHA and OHA, the defendant, **WALTER O. GUILLORY**, was the Chief Executive Officer of the Housing Authorities. As the Executive Director, he was responsible and accountable for the efficient and economical operation of all housing authority programs, in compliance with all applicable federal, state and local rules and regulations.

B. BRIBERY

1. Beginning in 2006 and continuing through 2010, in the Western District of Louisiana, the defendant, **WALTER O. GUILLORY**, being a public official, did, directly and indirectly, corruptly demand, seek, receive, accept, and agree to receive and accept anything of value personally and for any other person or entity, with the intent to be influenced in the performance of official acts; that is, the defendant solicited and received in excess of ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) in a series of transactions from individuals and companies who were vendors with the LHA or the OHA in exchange for using his official position to award or to renew contracts between the LHA and OHA and the vendors.

All in violation of Title 18 U.S.C. Section 666(a)(1)(B).

COUNT 2

Conspiracy to Commit Wire Fraud

[18 U.S.C. § 1343]

[18 U.S.C. § 1346]

[18 U.S.C. § 1349]

A. INTRODUCTION

All of the facts contained in Count 1 are incorporated by reference as if fully stated herein.

B. CONSPIRACY

Beginning in 2006 and continuing through 2009 in the Western District of Louisiana, the defendant, **WALTER O. GUILLORY**, being a public official, did willingly and knowingly conspire with others, both known and unknown, to defraud and deprive the citizens of Opelousas, Louisiana and the OHA of their right to the honest and faithful services of the defendant, **WALTER O. GUILLORY**, through bribery, kickbacks and the concealment of material information.

C. OBJECT OF THE CONSPIRACY

It was an object of the conspiracy for the defendant, **WALTER O. GUILLORY**, to use his official position to enrich himself by soliciting and by accepting donations, payments, and other things of value from vendors and contractors of the LHA and OHA.

It was further an object of the conspiracy that the defendant, **WALTER O. GUILLORY**, used his official position to enrich himself by soliciting and accepting donations, payments and other things of value from one of the contractors named K.A., in exchange for favorable official action, and for K.A. to enrich himself by obtaining favorable official action for himself and his company through corrupt means, including by circumventing the public bidding laws, rules and regulations, so that construction

contracts awarded by the OHA could be awarded primarily to K.A. from 2007 through 2009.

D. THE MANNER AND MEANS OF THE CONSPIRACY

1. As the Executive Director of the OHA, the defendant, **WALTER O. GUILLORY**, was responsible for insuring that the bid process was in compliance with the OHA procurement policy. This policy required that construction jobs be awarded via the competitive bid process.

2. The procurement policy was not followed and, instead, from 2007 through 2009, the construction contracts awarded by the OHA were awarded primarily to K.A., without utilizing the competitive bidding process.

3. In order to appear to be compliant with the bid laws, rules and regulations, **GARNETTE L. THOMAS**, a co-conspirator, who worked for the defendant, **WALTER O. GUILLORY**, as the Grant and Capital Funds Coordinator for the OHA, created false bids on projects. **GARNETTE L. THOMAS**, a co-conspirator, and others not named as defendants herein, created false bids by using the letterheads and information of other contractors, who were not placing bids on these projects. These false bids were placed in the file in order to give the appearance that the bid rules were being followed.

4. As the Executive Director of the OHA, the defendant, **WALTER O. GUILLORY**, was required to sign the construction contracts awarded by the OHA. From 2007 through 2009, **WALTER O. GUILLORY** approved these contracts with full knowledge that the bid rules, laws and regulations were not being followed.

5. In furtherance of this conspiracy and to further the objectives thereof, interstate wire communication facilities were used, including e-mail transmissions for a

variety of purposes, including sending and receiving e-mails related to contracts and bids.

All in violation of Title 18, United States Code, Sections 1343, 1346 and 1349. [18 U.S.C. § 1343, 18 U.S.C. §1346 and 18 U.S.C. § 1349].

CRIMINAL FORFEITURE

**[18 U.S.C. § 981(a)(1)(C)]
[28 U.S.C. § 2461(c)]**

1. The allegations of Count 1 of this Bill of Information are hereby re-alleged and incorporated as though fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c). [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)].

2. Upon conviction of this offense in violation of Title 18, United States Code, Section 666(a)(1)(B), as set forth in Count 1 of this Bill of Information, the defendant, **WALTER O. GUILLORY**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to:

ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) in United States Currency involved in the offense described in Count 1 of this Bill of Information;

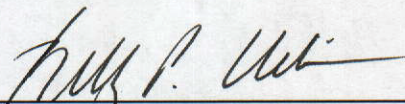
3. If any of the property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been

transferred to or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or, (e) has been comingled with other property which cannot be divided without difficulty, then the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c). All in violation of Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c). [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)].

Respectfully submitted by:

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